

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ELAINE KERN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 20-cv-01404
	)	
DZAVAD KRISO and	)	Hon. Marvin E. Aspen
BLUESTAR SERVICES LLC,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF TIMOTHY J. CAVANAGH**

NOW COMES Timothy J. Cavanagh, affiant, and hereby states upon penalty of perjury that if called upon to testify, he will competently state as follows:

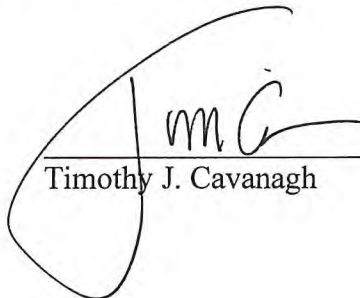
1. My name is Timothy J. Cavanagh; I am over the age of 18; and I am an attorney and the founder and owner of Cavanagh Law Group.
2. Cavanagh Law Group was retained to represent the Plaintiff in this matter, Elaine Kern.
3. I received and reviewed Defendants, Dzavad Krso and Bluestar Services, LLC's Notice of Removal and the Plaintiff's Motion to Remand.
4. On March 9, 2020, I read Defendant's Notice of Removal and reviewed all applicable statutes and case law to assess whether Plaintiff had a good faith basis to move for remand. I believe that I spent 1/2 (.5) hours performing the above tasks.
5. After completing my review of the applicable statutes and case law, I reviewed Plaintiff's Motion for Remand. This is an eight-page motion which cites statutory authority and case law. I believe that I spent 1/2 (.5) hours reviewing and editing said motion.



6. I am the founding partner at Cavanagh Law Group in my thirty-third (33rd) year of legal practice. I am a member of the Northern District of Illinois Trial Bar and serve on the Board of Managers of the Illinois Trial Lawyer's Association. I calculate that I spent one (1) hour reading Defendant's Notice of Removal and reviewing and editing Plaintiff's Motion to Remand. I propose an attorney's fee of \$800.00 per hour, which I believe is appropriate for an attorney of my experience in the Chicago area. Based on one (1) hour of preparation and review, and given an hourly fee of \$800.00, I request attorney's fees in the amount of \$800.00 for the review of Defendant's Notice of Removal and Plaintiff's Motion for Remand.

FURTHER AFFIANT SAYETH NAUGHT

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Timothy J. Cavanagh